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May 5, 2021

Via ECF

The Honorable John Koeltl, USDJ **United States District Court** Southern District of New York 500 Pearl Street New York, NY 10007

Re:

Crowley v. Billboard

Docket Number 19-CV-7571

Dear Judge Koeltl:

As the Court knows, this firm represents Plaintiff Patrick Crowley in the abovereferenced action. I write to respectfully request, on consent, an adjournment of the pre-motion conference from May 18, 2021 to either May 20, 2021 or June 8, 2021. The reason for the adjournment is that I have two other matters which were previously scheduled for the same day and same approximate time.

In addition, I respectfully request that, during the pre-motion conference, the Court will hear Plaintiff's request to move for summary judgment, in favor of Plaintiff, on Plaintiff's defamation claims. Also, I respectfully ask whether the parties need to respond to the premotion letters, as the pre-motion conference has now been scheduled.

I thank the Court for its time and its courtesies.

Respectfully submitted, MATTHEW S. POR

cc: Defendants' counsel (via ECF)

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ADSOURNED FO FUESDAT, JUNE 8, 2021, AF 11:08AM

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<sup>&</sup>lt;sup>1</sup> If the Court is unavailable on both of those dates, the parties can supply additional dates, but those were the only mutually available dates for all parties through the first two weeks of June.